



**U.S. Department of Justice**

Criminal Division

*Fraud Section*

*Washington, D.C. 20530*

May 17, 2022

**VIA EMAIL AND FEDERAL EXPRESS**

Sam Talkin  
40 Exchange Place, 18<sup>th</sup> Floor  
New York, New York 10005  
Samt@talkinlaw.com

Re: *United States v. Anuli Okeke*, Case No. 22-cr-20  
(EDNY)  
Government's Production of Materials #2

Dear Mr. Talkin:

Please find enclosed the government's second production of discovery in the above-captioned case in accordance with Rule 16 of the Federal Rules of Criminal Procedure. Also enclosed is a discovery index describing the various materials contained on the produced media.

The materials are being provided on a USB drive labeled "U.S. v. Okeke – Government Production 2". The Bates range for the documents being produced to you today is:

DOJ-0000000001 – DOJ-0000068507

The materials are encrypted; a case sensitive password will be sent to you via email. If you have any questions or requests regarding further discovery or a disposition of this matter, please do not hesitate to contact me.

Sincerely,

By: /s/ Jennifer L. Bilinkas  
Jennifer L. Bilinkas  
Chand W. Edwards-Balfour  
*Counsel for the United States of America*

Enclosures:  
1 USB Drive (via FedEx)

cc: Clerk of the Court (FB) (by ECF) (without enclosures)